

REMARKS

Reconsideration of the present application is respectfully requested. Independent claims 1, 9, 13, 18 and 25 have been amended. Claims 1 – 28 are currently pending.

Rejections based on 35 U.S.C. §103

Claims 1 – 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bruckner, U.S. Patent No. 6,208,992 (“Bruckner”), in view of Abrams, U.S. Patent No. 6,151,608 (“Abrams”), and further in view of Daudenarde, U.S. Patent No. 5,995,973 (Daudenarde”). Applicants have amended the independent claims in response to this rejection. Specifically, claim 1 now recites “a reference-counting mechanism” configured to “delete said item from the universal data storage device when said reference-counting mechanism determines that all relationships to said item are removed.” Applicants respectfully submit that neither Bruckner, Abrams nor Daudenarde, either alone or in combination, teaches or suggests the claimed deleting of items based on the results of a “reference-counting mechanism.” Independent claims 9, 13, 18 and 25 include similar claim language and are likewise patentable over Bruckner, Abrams and Daudenarde.

The Office Action relies on Bruckner to teach a universal data storage device; relies on Abrams to teach a mechanism for counting the number of relationships between objects; and relies on Daudenarde to teach the deleting of items from a data store when all the relationships to an item are removed. Office Action, pp. 4-6. Daudenarde provides a system for storing relationship tables identifying object relationships. Daudenarde, Abstract. As explained by the Office Action, Daudenarde teaches, “When the owner flag is set to TRUE, deleting the source object deletes the target object.” Office Action at p. 6 (citing Daudenarde, col. 9, lines 33-44).

As illustrated by this citation, Daudenarde deletes source objects *in response to the deletion of a target item*. Such deletion, of course, is analogous to the deletion of a file folder from a desktop environment—deleting the file folder also deletes each of the files residing within the folder. Thus, Daudenarde’s deletion of files is *in response to the deletion of the source object* (e.g., the file folder) and not in response to any reference counting performed with respect to the source objects.

In contrast to Daudenarde’s deleting of all files associated with a source object, independent claim 1 now requires a reference-counting mechanism configured “to delete said item from the universal data storage device when said reference-counting mechanism determines that all relationships to said item are removed.” Independent claims 9, 13, 18, and 25 contain similar language. Neither Bruckner, Abrams nor Daudenarde, either alone or in combination teaches or suggests each and every element of the present independent claims: Daudenarde’s file deletion does not contemplate any relationship counting; Abrams’s relationship counting is unrelated to any file-deletion mechanisms; and Bruckner fails to teach either relationship counting or the deletion of files based on a file’s relationships. As such, Applicants respectfully submit that amended independent claims 1, 9, 13, 18, and 25 are in condition for allowance.

Applicants also submit that dependent claims 2 - 8, which depend from claim 1, are in condition for allowance for at least the same reasons discussed above with respect to claim 1. Furthermore, Applicants submit that dependent claims 10 - 12, which depend from claim 9, are in condition for allowance for at least the same reasons discussed above with respect to claim 9. Applicants submit that dependent claims 14- 17, which depend from claim 13, are in condition for allowance for at least the same reasons discussed above with respect to claim 13. Applicants also submit that dependent claims 19 - 24, which depend from claim 18, are in

condition for allowance for at least the same reasons discussed above with respect to claim 18. Applicants submit that dependent claims 26 - 28, which depend from claim 25, are in condition for allowance for at least the same reasons discussed above with respect to claim 25.

Conclusion

For the reasons stated above, claims 1 – 28 are in condition for allowance. If any issues remain which would prevent issuance of this application, the Examiner is urged to contact the undersigned prior to issuing a subsequent action. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 19-2112.

Respectfully submitted,

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